

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*
Plaintiffs,

v.

Civ. Action No.: 14-cv-00029-AB

National Football League and
NFL Properties, LLC,
successor-in-interest to
NFL Properties, Inc.,
Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

STIPULATION AND [PROPOSED] ORDER¹

This Stipulation and Agreement is made this []th day of May 2015, by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook (ECF No. 6533);

WHEREAS, Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook have since submitted written requests seeking to revoke their Opt Out requests;

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook, subject to Court approval, because they submitted them before Opt Out litigation has commenced;

AND NOW, this 19 day of May, 2015, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook are accepted, subject to Court approval, because they submitted them before Opt Out litigation has commenced.

It is so STIPULATED AND AGREED,

By: 

Date: 5/19/15

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By: 

Date: May 19, 2015

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Counsel for the NFL Parties

It is so **ORDERED** that the revocation requests submitted by Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook all are approved and the Claims Administrator is **DIRECTED** to post an amended list of Opt Outs forthwith excluding Terrell Davis, Eric Kelly, Tyson Walter and Michael Westbrook.

ANITA B. BRODY, J.

Copies VIA ECF on _____ to:

Copies MAILED on _____ to: